

1 DAVID M. MICHAEL, CSBN 74031
2 EDWARD M. BURCH, CSBN 255470
3 LAW OFFICES OF DAVID M. MICHAEL
4 One Sansome Street, Suite 3500
5 San Francisco, CA 94104
6 Telephone: (415) 946-8996
Facsimile: (877) 538-6220
E-mail: david@davidmichaellaw.com

7 Attorneys for Claimant
8 JULIO FIGUEROA

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 UNITED STATES OF AMERICA,

No. 3:14-cv-00780-SC

12 Plaintiff,

13 v.

14 \$209,815 IN UNITED STATES CURRENCY,

STIPULATION TO EXTEND TIME FOR
MOTION TO SUPPRESS REPLY BRIEF
NUNC PRO TUNC

15 Defendant.

16 JULIO FIGUEROA,

17 Claimant.

20 The parties through their undersigned counsel agree, subject to the Court's approval, that
21 Claimant may have up to and including June 13, 2014, to file his reply in support of his motion
22 to suppress.

24 The reply brief was due on or before June 10, 2014. The reason the Claimant has
25 requested counsel for Plaintiff to agree an extension for the filing deadline by three days is due to
26 unexpected increased case load, mainly regarding Claimant's counsel's ongoing murder
27 prosecution in Orange County, California, while co-counsel Burch was overseas on a long
28 planned vacation. Counsel for Plaintiff graciously agreed.

1 IT IS SO STIPULATED:

2
3 LAW OFFICES OF DAVID M. MICHAEL

4 Dated: 13 June 2014

5 *s/Edward M. Burch*
6 DAVID M. MICHAEL
7 EDWARD M. BURCH
8 Attorneys for Claimant Julio Figueroa

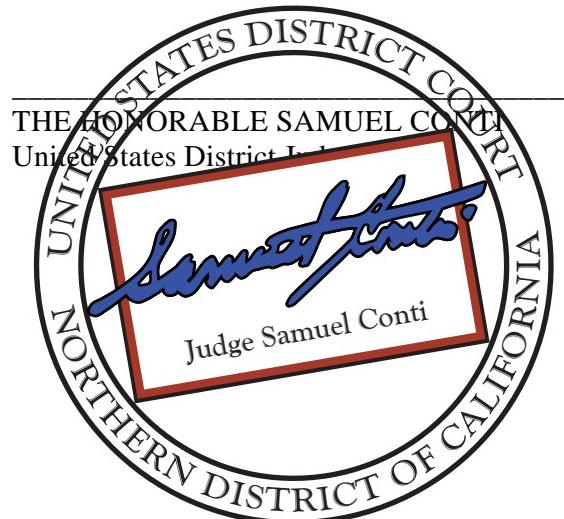
9 MELINDA HAAG
10 United States Attorney

11 Dated: 13 June 2014

12 *s/Patricia J. Kenney*
13 PATRICIA J. KENNEY
14 Assistant United States Attorney
15 Attorneys for the United States

16 PURSUANT TO THE FOREGOING STIPULATION IT IS SO ORDERED.

17 Dated: 6/16/2014



1 **CERTIFICATE OF ELECTRONIC SERVICE**

2 I hereby certify that, on 13 June 2014, I caused to be electronically filed the foregoing
3 with the clerk of the court by using the CM/ECF system, which will send a notice of electronic
4 filing on all ECF-registered counsel by operation of the Court's electronic filing system. Parties
may access this filing through the Court's system.

5 *s/Edward M. Burch*
6 EDWARD M. BURCH
7 Attorney for Claimant Julio Figueroa